COLUMBIA RIVER PILOTS
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February 25, 2004

Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

By Federal Express Overnight Mail

04-344

Re: Maritel Sharing Proposal; DA 04-378

Dear Secretary Powell:

The Columbia River Pilots ("COLRIP") is an organization of maritime pilots serving vessel traffic between Astoria, Oregon, at the mouth of the Columbia River, and the head of navigation on the Columbia and Willamette Rivers. Most vessels transit between Astoria and Portland, Oregon or Vancouver, Washington. This 85 mile pilotage route is through a mountainous area with many turns and river bends. This obstructive geography limits the usefulness of radar and line-of-site radio transmissions, including those associated with AIS systems using VHF frequencies, to relatively short distances. We are writing to object to the "Maritel Sharing Proposal." That proposal, in the context of the geography of our pilotage ground, would effectively eliminate our ability to deploy the AIS system we have been developing and testing for several years.

COLRIP began work on an AIS system for the lower Columbia and Willamette Rivers in the late 1990s. The purpose was and is greater safety in navigation. The goal was a system utilizing portable transponders carried aboard ships by pilots, with information displayed on laptop computers, also carried aboard. Because of the geography of the route, transponder transmissions would have to be relayed through a series of repeaters on towers strategically located over the 85-mile length of the route, thereby allowing every piloted vessel on the route to "see" every other vessel's AIS transmissions. It would also allow receipt of the AIS signals from all piloted vessels at a stationary unit in the pilot station/dispatching office located in Portland, Oregon.

COLRIP worked in cooperation with the Columbia River Steamship Operators' Association, an organization of vessel agents, which provided funding for the development and testing of the COLRIP AIS system. In early 2001, COLRIP entered into a contract with Volpe National Transportation Systems Center of the U.S. Department of Transportation for technical assistance in design and testing phases of system development. Soon thereafter, the events of September 11, 2001, hastened the requirement for ships to carry AIS transponders. This led to simplification of our system design, so that fewer vessels will need the carry-aboard transponders, with those already equipped allowing for the "plug and play" of pilot carried

laptops loaded with system software into the ship's AIS unit. The COLRIP AIS system has now completed the final phases of testing, and all aspects of the system operated very well.

The system in its current configuration provides a wide array of very useful information to pilots transiting the Columbia and Willamette Rivers, and to COLRIP's dispatching center. Every pilot with a display can access static information about every other vessel, and the software developed for the system generates a detailed visual display showing locations, meeting points, vessel speeds and headings and many other elements of information useful for navigation. The result is much improved vessel safety and the ability to more effectively manage traffic on the waterway. With the testing phase winding down after a nearly unqualified success, COLRIP had expected to begin deployment of the full system within the next 12 to 15 months. The Maritel Sharing Proposal, if accepted, would eliminate COLRIP's ability to proceed with its AIS system. Moreover, the technical standards for AIS systems developed and agreed to internationally would be jeopardized, at best, and possibly rendered useless.

As we understand the Maritel Sharing Proposal, Channels 87B and 88B could be used only by ship stations and the Coast Guard for VTS purposes. Shore stations could neither send nor receive over these two Channels (except for Coast Guard shore stations). These restrictions would eliminate the possibility of COLRIP having an AIS receiver/display in its dispatching office, thus depriving dispatchers of useful information for close timing of departures and arrivals. Similarly, it would eliminate the receipt/re-transmission of AIS signals by repeaters on towers over the 85 mile pilotage route. This latter restriction would substantially eliminate most of the value of the system by reducing it to a line-of-sight system involving only ship stations. Much of the value of the system is to track and evaluate information between vessels that are many miles and many river bends away from each other, so that meeting and overtaking events can be planned for safe locations rather than having vessel encounters in the most difficult areas. This advance planning value is eliminated if the system is restricted to close-in, line-of-sight usage of AIS between two ship stations. Even the Coast Guard could not operate an AIS shore station under the Maritel Sharing Proposal unless the shore station was part of a vessel traffic system or used for homeland security surveillance purposes.

We urge you to reject the Maritime Sharing Proposal. We hope that some accommodation of Maritel's interest in Channels 87B and 88B can be found that does not eliminate our ability to deploy an AIS system for the Columbia and Willamette Rivers.

Very truly yours,

COLUMBIA RIVER PILOTS

Steve Brown

Captain Steve Brown, President

cc: CRSOA
Volpe Center
American Pilots Association